

**FILED**

**JAN 16 2025**

Clerk, U.S. Courts  
District Of Montana  
Billings Division

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**ATTORNEY FOR PLAINTIFF  
UNITED STATES OF AMERICA**

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MONTANA  
BILLINGS DIVISION**

**UNITED STATES OF AMERICA,**

**Plaintiff,**

**vs.**

**ZACHARY LOUIS SIMPSON,**

**Defendant.**

**CR 25-09 -BLG-SPW**

**INDICTMENT**

**THEFT OF MAIL**

**(Count 1)**

**Title 18 U.S.C. § 1708**

**(Penalty: Five years imprisonment,  
\$250,000 fine, and not more than three  
years supervised release)**

**THEFT OF MAIL BY EMPLOYEE**

**(Count 2)**

**Title 18 U.S.C. § 1709**

**(Penalty: Five years imprisonment,  
\$250,000 fine, and not more than three  
years supervised release)**

**CRIMINAL FORFEITURE**

**18 U.S.C. § 981(a)(1)(C) and  
28 U.S.C. § 2461**

**THE GRAND JURY CHARGES:**

COUNT 1

Between on or about March 27, 2023, and April 3, 2024, at Billings, in Yellowstone County, in the State and District of Montana, the defendant, ZACHARY LOUIS SIMPSON, did unlawfully steal, take, and abstract packages and other mailings from an authorized depository for mail matter, in violation of 18 U.S.C. § 1708.

COUNT 2

Between on or about March 27, 2023, and April 3, 2024, at Billings, in Yellowstone County, in the State and District of Montana, the defendant, ZACHARY LOUIS SIMPSON, a United States Postal Service employee, did willfully, knowingly and intentionally embezzle packages and other mailings, which had been entrusted to him and which came into his possession to be conveyed by mail, while performing his assigned duties as an employee of the United States Postal Service, in violation of 18 U.S.C. § 1709.

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FORFEITURE ALLEGATION

Upon conviction of the offense set forth in counts 1 and 2 of the indictment, the defendant, ZACHARY LOUIS SIMPSON, shall forfeit to the United States, pursuant to 18 U.S.C. § 981(a)(1)(C), by way of 28 U.S.C. § 2461(c), any property, real and personal, which constitutes or is derived from proceeds traceable to such offense or a conspiracy to commit such offense.

A TRUE BILL.

Foreperson signature redacted. Original document filed under seal.



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JESSE A. LASLOVICH  
United States Attorney



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CYNDEE L. PETERSON  
Criminal Chief Assistant U.S. Attorney